

JOSEPH P. RUSSONIELLO (CASBN 44332)  
United States Attorney

**BRIAN J. STRETCH (CSBN 163973)**  
Chief, Criminal Division

MATTHEW A. PARRELLA (NYSBN 2040855)  
JEFFREY D. NEDROW (CASBN 161299)  
JEFFREY R. FINIGAN (CASBN 168285)  
Assistant United States Attorneys

450 Golden Gate Avenue  
San Francisco, California 94102  
Telephone: (415) 436-7232  
Facsimile: (415) 436-7234  
Email: [jeffrey.finigan@usdoj.gov](mailto:jeffrey.finigan@usdoj.gov)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
  
TREVOR GRAHAM,  
Defendant.

Criminal No. CR 06-0725 SI

## STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME

The above-captioned matter came before the Court on February 1, 2008, for status. The defendant was represented by William Keane, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The Court set a briefing schedule for a defense discovery motion and confirmed the May 19, 2008, trial date. The defense discovery motion is to be filed on February 8, 2008.

The Court made a finding that the time from and including February 1, 2008, through

STIPULATION AND [PROPOSED]  
ORDER EXCLUDING TIME  
CR 06-0725 SI

February 8, 2008, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

The parties further agree and stipulate that this time exclusion is in addition to the time exclusion ordered by the Court on December 14, 2007, at which time the Court excluded time for the same reasons set forth herein from and including December 14, 2007, through and including the trial date of May 19, 2008. The parties include this additional acknowledgment because they did not execute a written stipulation to this effect following the December 14, 2007, hearing.

DATED: February 4, 2008

/s/  
 WILLIAM P. KEANE  
 Counsel for Trevor Graham

DATED: February 4, 2008

/s/  
 JEFFREY R. FINIGAN  
 Assistant U.S. Attorney

So ordered.

DATED:

  
 SUSAN ILLSTON  
 UNITED STATES DISTRICT COURT JUDGE